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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

KELLY TOYS HOLDINGS, LLC,
JAZWARES, LLC, KELLY
AMUSEMENT HOLDINGS, LLC,
and JAZPLUS, LLC,

Plaintiff,

vs.

BUILD-A-BEAR WORKSHOP, INC.,

Defendant.

Case No. 2:24-cv-1169-JLS (MARx)

**DECLARATION OF SOURABH
MISHRA IN SUPPORT OF
PLAINTIFFS' RESPONSE TO THE
COURT'S ORDER IN ECF 58**

1 I, Sourabh Mishra, declare as follows:

2 1. I am a Partner at Hueston Hennigan LLP (“Hueston Hennigan”), counsel
3 of record for Plaintiffs in this action. If called upon to do so, I could and would testify
4 truthfully based upon my own personal knowledge as follows.

5 2. I submit this Declaration in support of Plaintiffs’ Response to the Court’s
6 Order in ECF 58. The purpose of this declaration is to detail the fees and costs billed
7 by Hueston Hennigan and incurred by Plaintiffs in connection with Defendant’s
8 motion to compel underlying the Order in ECF 58 (“Motion to Compel”).

9 **Background of Hueston Hennigan and Relevant Personnel**

10 3. Hueston Hennigan’s offices are in Los Angeles and Newport Beach,
11 California, and New York City, New York. Industry publications including Chambers,
12 Law360, and the National Law Journal have recognized Hueston Hennigan as a
13 leading litigation boutique. Hueston Hennigan regularly handles critical, high-stakes
14 litigation for well-known companies.

15 4. Below, I briefly outline the qualifications of the attorneys who worked on
16 this matter. In addition to their professional accomplishments, I believe that each
17 person’s experience with complex litigation additionally qualifies them to represent
18 Plaintiffs in this matter.

19 5. The Hueston Hennigan team that worked on issues relating to the Motion
20 to Compel included: two Partners (myself and Michael Todisco); and one Associate
21 (Amber Munoz).

22 6. Sourabh Mishra. I am a Partner at Hueston Hennigan. I earned his
23 undergraduate degree in economics and government from Dartmouth College, *cum*
24 *laude*, in 2010, and graduated from Columbia Law School in 2015, where I was a
25 Harlan Fiske Stone Scholar and a member of the *Columbia Law Review*. I have
26 worked at Hueston Hennigan since 2015 and have represented large companies in
27 high-stakes, complex litigation. I have received recognition as an attorney, including:
28 (1) one of five Rising Stars nationwide for Trials by *Law360* in 2024; (2) 40 & Under

Hot List by *Benchmark Litigation* in 2024; (3) Leaders of Influence: Minority Attorneys, *Los Angeles Business Journal* in 2023; (4) Southern California Rising Star since 2020; and (5) Best Lawyers: Ones to Watch since 2021. Attached as **Exhibit B** to this Declaration is a true and correct copy of Mr. Mishra's biography as displayed on the Hueston Hennigan website.

7. Michael Todisco. Mr. Todisco is a Partner at Hueston Hennigan. He earned his undergraduate degree from the University of Notre Dame, *summa cum laude*, and graduated from Stanford Law School in 2016, where he served as a senior editor for the *Stanford Law Review*. He has worked at Hueston Hennigan since 2017 and has represented large companies in high-stakes, complex litigation. Mr. Todisco has received recognition as an attorney, including: (1) the Rising Star of the Year by the *Los Angeles Business Journal* in 2021; (2) Southern California Rising Star since 2021; and (3) Best Lawyers; Ones to Watch since 2024. Attached as **Exhibit C** to this Declaration is a true and correct copy of Mr. Todisco's biography as displayed on the Hueston Hennigan website.

8. Amber Munoz. Amber Munoz is an Associate at Hueston Hennigan. She earned her undergraduate degree from the University of California, Santa Barbara, and graduated with Order of the Coif from UCLA School of Law in 2019, where she served as an extern for the Honorable Kim McLane Wardlaw for the U.S. Court of Appeals for the Ninth Circuit and as a managing editor of the *Women's Law Journal*. Ms. Munoz has worked at Hueston Hennigan since 2019 and has represented large companies in high-stakes, complex litigation. Ms. Munoz has received recognition as an attorney, including as Southern California Rising Star in 2025. Attached as **Exhibit D** to this Declaration is a true and correct copy of Ms. Munoz's biography as displayed on the Hueston Hennigan website.

Fees and Costs Incurred Relating to the Motion to Compel

9. Hueston Hennigan will bill Plaintiffs for work relating to the Motion to Compel based on the rates and hours identified herein. A detailed breakdown of the

1 fees is included in **Exhibit A**. We have included a column indicating whether the work
2 was attributable to the Motion to Compel or briefing for fees after the Motion to
3 Compel was decided.

4 10. In total, Plaintiffs request recovery of \$11,215.80 in fees. These fees are
5 based on: (1) 7.7 hours by Mr. Mishra to analyze Plaintiffs' positions in the Motion to
6 Compel, to be the primary drafter of the opposition sections and supporting materials
7 to the Motion to Compel, and analyze Defendant's supplemental submission to the
8 Motion to Compel; (2) 0.7 hours expended by Mr. Todisco to revise the opposition
9 sections to the Motion to Compel; (3) 1.2 hours by Ms. Munoz to revise the opposition
10 sections to the Motion to Compel; (4) 1.3 hours by Mr. Mishra to draft and revise
11 materials in connection with the fees briefing; and (5) 2.5 hours by Ms. Munoz to draft
12 and revise materials in connection with the fees briefing. In my experience, these
13 hours are reasonable for the tasks they are associated with.

14 11. Plaintiffs are not seeking fees for billers other than Mr. Mishra, Mr.
15 Todisco, and Ms. Munoz, including other attorneys who consulted on strategy relating
16 to the Motion to Compel and staff who assisted with finalizing and filing materials
17 relating to the Motion to Compel and fees briefing. Plaintiffs also are not seeking fees
18 relating to the pre- or post-Order written and oral meet and confers about the same
19 issues.

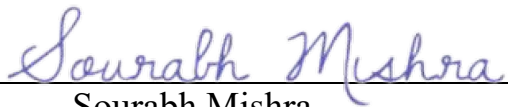
20 12. Hueston Hennigan's fee arrangement with Plaintiffs is a special rate for
21 affirmative litigation. For all attorneys working on this case, Hueston Hennigan in
22 March 2025 charged Plaintiffs \$930/hr with a 10% discount, meaning that the actual
23 charged rate is \$837/hr. This discounted rate represents a significant discount when
24 compared to Hueston Hennigan's standard billing rates for the attorneys-at-issue in
25 2025: an almost 50% discount for Mr. Mishra; almost 45% discount for Mr. Todisco;
26 and an almost 30% discount for Ms. Munoz.

1 13. I am generally familiar with the market for legal services in Southern
2 California. Through my work as a partner at Hueston Hennigan and my experience in
3 the legal industry, I am generally aware of the rates charged by attorneys with similar
4 experience on similar matters. Based on my personal knowledge, the standard hourly
5 rates charged by Hueston Hennigan are comparable to the prevailing market rates
6 charged by similar firms. The rates billed are especially reasonable when considering
7 the complexity of this matter.

8 14. To the extent the Court would like additional information, detail, or
9 explanation about any of these submitted fees and costs, Plaintiffs and Hueston
10 Hennigan are willing to provide it.

11 I declare under penalty of perjury under the laws of the United States of America
12 that the foregoing is true and correct.

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14 Executed this 1st day of April, 2025, at Newport Beach, California.

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18 Sourabh Mishra